



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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AFM:MAA/IC/CB  
F. #2017R00906

271 Cadman Plaza East  
Brooklyn, New York 11201

April 6, 2025

By ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re:     United States v. Michael McMahon  
Criminal Docket No. 21-265 (S-1) (PKC)

Dear Judge Chen:

The government writes to correct a statement in its sentencing submission dated April 3, 2025. (ECF No. 364.) In that submission, the government stated that Martha Byrne was a co-founder of the Pipe Hitter Foundation, an entity that has advocated on the defendant's behalf. (*Id.* at 26 n.16.) This statement appears to have been erroneous. The government regrets the apparent error.

Respectfully submitted,

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Eastern District of New York

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SUE J. BAI  
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Department of Justice  
National Security Division

By: /s/  
Christine Bonomo  
Trial Attorney

Cc: Clerk of the Court (by ECF and Email)  
Counsel of Record (by ECF)